



ADVISORY BULLETIN

December 18, 2020

Tips for Medical Applicants

The Marijuana Regulatory Agency (MRA) is issuing this advisory bulletin to provide medical facilities licensing applicants with guidance on how to avoid common issues that delay Step 1 and Step 2 application processing times.

STEP 1 APPLICATIONS

Submitting a Complete Application

It is important that applicants submit all required documentation when submitting a prequalification application. Failure to submit a complete application will result in delayed processing times.

Below are the most common deficiencies the MRA has identified while processing Step 1 applications:

- Submitting the wrong medical facilities licensing application. The following is a guide for each application type:
 - If the main applicant is an entity, complete the [Applicant Entity Prequalification Application](#) (AEPA).
 - If the main applicant is a sole proprietor, complete the [Sole Proprietor Prequalification Application](#) (SPPA).
 - If the supplemental applicant is an entity, complete the [Supplemental Entity Prequalification Application](#) (SEPA).
 - If the supplemental applicant is an individual, complete the [Supplemental Individual Prequalification Application](#) (SIPA).
- Submitting an outdated version of the medical facilities licensing application. As of June 22, 2020, the MRA is no longer accepting previous versions of any application. Use the links above to obtain the most recent versions of the applications.
- Submitting an adult-use application instead of the medical facilities licensing application. Use the links above to obtain the most recent version of the medical facilities licensing applications.
- Submitting one SEPA or SIPA application for multiple main applicant entity applications. Please note that if a supplemental entity or individual is applying on multiple main

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applicant entity applications, a SEPA or SIPA is required to be submitted with each main applicant entity application.

- At the time of submission, the main applicant record was created in Accela and the AEPA was submitted. However, the supplemental applicant records still need to be created in Accela, along with the corresponding applications to make the record complete for review. It is recommended that the application fee not be paid until all supplemental applicant records have been created in Accela and all required documents have been uploaded to the respective record.
- Failing to submit all required supporting documentation when the application is submitted. Use the links below for each application type to verify you have completed all the required supporting documents before you submit the application:
 - [Applicant Entity Checklist](#)
 - [Sole Proprietor Checklist](#)
 - [Supplemental Entity Checklist](#)
 - [Supplemental Individual Checklist](#)
- Submitting blurry or unreadable documents that staff are unable to review. Please upload PDF documents to ensure applications can be processed without delay.

Attestation F

Attestation F is the confirmation of tax compliance attestation in which the Michigan Department of Treasury confirms the applicant has no delinquency in payments and has satisfied all obligations for any sales or any other taxes that were to be levied on the sale of marijuana. This attestation is in accordance with the Treasury bulletin RAB 2018-2 titled "Marihuana Provisioning Center Tax and Sales and Use Tax Treatment of Marihuana" which was issued January 18, 2018, as well as any subsequent bulletins released regarding tax obligations.

Before completing and submitting Attestation F, please note the following:

- Part A must be completed by the applicant before the applicant submits it to the Michigan Department of Treasury.
- Part B must be completed by a designee of the Michigan Department of Treasury before the applicant can submit the attestation to the MRA.
- The treasury attestation must be signed by the Department of Treasury before the applicant signs and dates the Acknowledgement of Attestations form.
- The attestation must be submitted with the application packet to the MRA.

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Ownership Disclosure

- All entities and individuals that hold greater than 10% interest in the main applicant entity seeking licensure are required to be disclosed on Disclosure 2 – Affiliated Parties & Spouses of the Applicant Entity Prequalification Application (AEPA).
- All managerial employees are required to be disclosed on Disclosure 2 – AEPA. A managerial employee is a person who can control and direct the affairs of the marijuana business and/or make policy concerning the marijuana business.
- All entities and individuals that hold 2.5% to 10% in the main applicant entity seeking licensure are required to be disclosed on Disclosure 2 – Ten Percent or Less of the AEPA.
- If a publicly held corporation, all entities and individuals that hold 5% to 10% in the main applicant entity seeking licensure are required to be disclosed on Disclosure 2 – Ten Percent or Less of the AEPA.
- Please note that all entities and individuals that hold less than 2.5% in the main applicant entity seeking licensure are not required to be disclosed on the medical facilities licensing application.

Organizational Structure

All entities or individuals that are required to be disclosed on the AEPA as specified above must also be disclosed on the organizational structure.

STEP 2 APPLICATIONS

Inspection Process

There are two parts to the inspection process that must be completed before a license can be issued – the MRA enforcement inspection and Bureau of Fire Services (BFS) inspection.

The BFS inspection process also includes a plan review prior to inspection if the license type being applied for is a grower or processor. The MRA will notify the applicant when they are eligible to submit the facility plans to BFS to begin the plan review process.

We recommend that Step 2 applications only be submitted if the facility will be ready for inspection within 60 days of application submission. Submitting a Step 2 application prior to the facility being ready for inspection will not result in an inspection being scheduled or reserve

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an inspection slot for the applicant. There is no advantage to submitting a Step 2 application prior to the facility being ready for inspection.

Physical Address of Facility

The physical address of the facility listed on the facility license application, certificate of occupancy and deed or lease agreement must all be the same. If the address on these documents do not match, the applicant will be required to submit documentation stating the correct address of the facility.

Questions can be sent to the Marijuana Regulatory Agency, Medical Facilities Licensing Section via email at MRA-Applications@michigan.gov.

For more information about the Marijuana Regulatory Agency, please visit www.michigan.gov/MRA.